

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

**FEMHEALTH USA, INC., d/b/a
CARAFEM,**

Plaintiff,

v.

**RICKEY NELSON WILLIAMS, JR.;
BEVELYN Z. WILLIAMS;
EDMEE CHAVANNES; OPERATION
SAVE AMERICA; JASON STORMS;
CHESTER GALLAGHER; MATTHEW
BROCK; COLEMAN BOYD; FRANK
“BO” LINAM; BRENT BUCKLEY; and
AJ HURLEY.**

Defendant.

Civil Action No.3:22-cv-00565

SUPPLEMENTAL DECLARATION OF MICHELLE DAVIDSON

I, Michelle Davidson, declare the following under 28 U.S.C. § 1746 and penalty of perjury:

1. I am an adult over 18 years of age and have personal knowledge of the facts in this declaration.

2. I am the Security Director at National Abortion Federation (“NAF”). NAF connects, represents, serves and supports providers of abortion-related healthcare throughout the country (“Members”). In my role as Security Director, I provide security support and assistance to Members in the United States, Canada, Mexico City, and South America. I have been in that role for eleven years.

3. As a part of my routine duties, I provide surveillance and intelligence gathering regarding known threats to Members.

4. On July 25, 2022, two days before OSA blocked the entrance to carafem, I saw that AJ Hurley posted on Facebook about the plans of OSA. He indicated that the Christian response to abortion is “rescue,” and that “as amazing as sidewalk counseling is, it’s not rescue. It’s not what that verse is commanding. Rescue holds back someone from harming another. Rescue is risking your life to save someone. It isn’t giving a murderer the free choice to go kill and asking them politely not to.” He goes on to respond to a comment later in the thread stating that “[u]sing your body to stop a clinic from functioning is a nonviolent way of rescue.” The social media post and comment that I reviewed have been attached as Exhibit A. The next day, on July 26, 2022, Dale Sochia, OSA member, went on the Coach Dave Live show, which I listened to, and asked for prayer, stating that “there could be a potential interposition” that day.¹

5. The day of the obstruction at carafem, Brent Buckley posted videos of the obstruction and conversations with Mt. Juliet police officers immediately afterwards, which I have reviewed.² When told by security personnel to get off the property, the group refused and said “no sir.” (Exhibit B). In the discussion with the Mt. Juliet Police, Jason Storms and others made repeated comments that they were above the law: “It really doesn’t matter what men say . . . we got men out here who are willing to do what needs to be done. . . . We have to obey god rather than men.” “We’re going to be obedient to god’s law, not man’s.” “We think [our action] is always lawful.” (Exhibit C). The videos that I reviewed have been attached as Exhibits B and Exhibit C.

¹ Dave Daubenmire Podcast, July 26, 2022 <https://coachdavelive.com/podcast/coach-dave-live-7-26-2022-be-ready-to-step-up-audio-only>

² Brent Buckley Facebook Post, *available at* <https://www.facebook.com/brent.buckley.564/posts/2004653663060391>

6. I have also reviewed social media posts since the events in question and initiation of the lawsuit. From my knowledge of and surveillance of the individuals associated with OSA, I can confirm the identities of Jason Storms holding the Service Package addressed to him. To his left is a gentleman named Lucas Childress, who is holding a Service Package not belonging to him. The other four men in the picture from left to right are Bo Linam, Brent Buckley, Matthew Brock, and Coleman Boyd, all holding their Service Packages.³ A snip of this post has been attached as Exhibit D.

7. As a part of my routine surveillance, I have also identified public statements that indicate that the Defendants will continue their disruptive and threatening behavior:

- a. Jason Storms stated on the record to WPLN in Nashville that while OSA has “no plans to keep up the protests,” more “activities” are planned for after August 25, when Tennessee’s full abortion ban triggered by *Roe v. Wade* takes effect.⁴ The article has been attached as Exhibit E.
- b. In a post celebrating the receipt of summons in this lawsuit, Matt Brock stated that he and Coleman Boyd were “we are tangled up in a lawsuit together for interposing on behalf of our pre-born neighbors and there’s not another man in the world I would rather have beside me in front of the magistrates.” A commenter, Rusty Thomas, responded “And that my friends is part of what makes OSA, well, OSA.

³ Brent Buckley Facebook Post, *available at* <https://www.facebook.com/brent.buckley.564/posts/2008066312719126>.

⁴ WPLN, Federal judge orders protesters to stay away from the Mt. Juliet abortion clinic, August 2, 2022, *available at* <https://wpln.org/post/federal-judge-orders-protesters-to-stay-away-from-the-mt-juliet-abortion-clinic/>.

Praise the Lord and keep passing the ammo.”⁵ A snip of the post has been attached as Exhibit F.

- c. In a post on August 3, 2022, Matt Brock posted a call to action: “You find out that a dad has hired a thug \$1000 to kidnap and murder his 5yr old child. You call the cops, you call the judge, you call the District Attorney and to your amazement, not only do they not care, but they actually tell you to mind your business and that if you interfere, you will be taken to jail. The clock is ticking. Your magistrates have failed in their duty. YOU are that child’s only hope. How far is too far for you in that moment to save that child’s life?”⁶ A snip of the post has been attached as Exhibit G.
- d. In a post on August 3, Matt Brock posted a quote of himself and Jason Storms from a newspaper article in the AP News with his statement “If the trigger law is in effect, and you’re not going to enforce the law, we have people here who will enforce the law.” In the caption, he stated “Romans 13 and stuff ” -- a reference to OSA’s stated adherence to the “lesser magistrates” doctrine which calls for disobedience to laws that are contrary to the group’s narrow vision of theocracy.⁷ He responded to a post stating that he did not know Bevelyn Williams, Rickey Williams, or Edmee Chavannes, with an immediate follow up statement that “With that said, I do believe that there is a Biblical precedent for righteous lying [smiling face emoji].

⁵ Matt Brock Facebook Post, *available at* <https://www.facebook.com/amy.m.brock.5/posts/10166834587690472>.

⁶ Matt Brock Facebook Post, *available at* <https://www.facebook.com/amy.m.brock.5/posts/10166829619795472>.

⁷ Matt Brock Facebook Post, *available at* <https://www.facebook.com/amy.m.brock.5/posts/10166829112190472>.

The story of Esther comes to mind.” Amy Plumley stated “pretty sure she spoke for OSA conference right after Jason took over.” Brock responded “it’s hard for me to condemn someone for acting as though real children are being murdered in those buildings... I think ALL of us would be a little more ‘dramatic’ in our actions if we could truly grasp the reality that babies are being murdered while we stand outside and ‘peacefully protest.’” A snip of the post has been attached as Exhibit H.

- e. Even before the obstructions and threats began, Defendant Chet Gallagher stated in May 2022 that “By now we hope you are all convinced that overturning Roe never could or would end abortion!”⁸ A snip of the post has been attached as Exhibit I.

Dated: August 9, 2022

A handwritten signature in black ink, appearing to read "M. Davidson", written over a horizontal line.

Michelle Davidson

⁸ Chet Gallagher Facebook Post, available at <https://www.facebook.com/chetgallagher/posts/10221996684208591>.

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing will be served this 9th day of August, 2022 via Federal Express, on the defendants identified below:

Via Federal Express

Aaron J. Hurley
2526 5th St.
Santa Monica, CA 90405

Via Federal Express

Brent Buckley
516 S. Main St.
Topeka, IN 46571

Via Federal Express

Chester “Chet” Gallagher
1145 Holloway Road
Lebanon, TN 37090

Via Federal Express

Coleman Boyd
1635 North Davis Road
Bolton, MS 39041

Via Federal Express

Edmee Chavannes
9100 Integra Preserve Ct., #316
Ooltewah, TN 37363

Via Federal Express

Bevelyn Z. Williams
9100 Integra Preserve Ct., #316
Ooltewah, TN 37363

Via Federal Express

Frank “Bo” Linam
195 Spring Creek Lane
Lebanon, TN 37090

Via Federal Express

Jason Storms
955 County Road C
Grafton, WI 53024

Via Federal Express

Matthew Brock
14 Anderson St.
Inman, SC 29349

Via Federal Express

Operation Save America National, Inc.
c/o Frank Campana, Registered Agent
847 Remsen Ave NW
Palm Bay, FL 32907

Via Federal Express

Rickey Nelson Williams, Jr.
9100 Integra Preserve Ct., #316
Ooltewah, TN 37363

/s/ Sarah B. Miller